

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:18-CR-006-0

SUE MOBLEY (13)  
a/k/a "Star"

FACTUAL RESUME

INFORMATION: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

MAXIMUM PENALTY:

- Imprisonment for at least five (5) years and not more than forty (40) years;
- A fine not to exceed \$5,000,000 or both a fine and imprisonment;
- A supervised-release term of at least four (4) years and a maximum of Life, which is mandatory under the law and will follow any imprisonment term. If the defendant violates any of the supervised-release conditions, he could be imprisoned for the entire supervised-release term, resulting in additional prison time;
- A \$100 mandatory special assessment; and
- Incarceration of supervision costs.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in the Information are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second: That the defendant knew of the unlawful purpose of the agreement;

- Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and
- Fourth: That the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

1. The defendant, Sue Mobley, hereby stipulates and agrees that at all times relevant to the Information herein, the following facts were true:
2. That the defendant, Sue Mobley is the same person charged in the Information.
3. That the events described in the Information occurred in the Northern District of Texas.
4. That Sue Mobley and one or more persons in some way or manner made an agreement to commit the crime charged in the Information, to knowingly and intentionally possess with the intent to distribute methamphetamine, a Schedule II controlled substance.
5. That Sue Mobley knew the unlawful purpose of the agreement and joined in it with the intent to further it.
6. That Sue Mobley knew or reasonably should have known that the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

SIGNED this 9<sup>th</sup> day of January, 2018.

  
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SUE MOBLEY  
Defendant

  
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MELINDA JOAN LEHMANN  
Counsel for Defendant